1 2 3 4 5	Scott A. Kronland (SBN 171693) Stacey M. Leyton (SBN 203827) Eileen B. Goldsmith (SBN 218029) Danielle E. Leonard (SBN 218201) Robin S. Tholin (SBN 344845) James Baltzer (SBN 332232) ALTSHULER BERZON LLP 177 Post St., Suite 300 San Francisco, CA 94108	PATRICK D. ROBBINS (CABN 152288) Acting United States Attorney PAMELA T. JOHANN (CABN 145558) Chief, Civil Division KELSEY J. HELLAND (CABN 298888) Assistant United States Attorney U.S. ATTORNEY'S OFFICE 450 Golden Gate Avenue, Box 36055 San Francisco, California 94102-3495	
6 7 8 9 10 11 12 13	Attorneys for Plaintiff Organizations	ERIC HAMILTON Deputy Assistant Attorney General DIANE KELLEHER Branch Director CHRISTOPHER HALL Assistant Branch Director JAMES D. TODD, JR. Senior Trial Counsel YURI S. FUCHS Trial Attorney U.S. DEPARTMENT OF JUSTICE Civil Division, Federal Programs Branch P.O. Box 883 Washington, Dc 20044  Counsel For Defendants	
15	UNITED STATES	DISTRICT COURT	
16	FOR THE NORTHERN DISTRICT OF CALIFORNIA		
17	SAN FRANCISCO DIVISION		
18 19 20 21 22 23 24 25 26 27	AMERICAN FEDERATION OF GOVERNMENT EMPLOYEES, AFL-CIO; AMERICAN FEDERATION OF STATE COUNTY AND MUNICIPAL EMPLOYEES, AFL-CIO, et al.,  Plaintiffs,  v.  UNITED STATES OFFICE OF PERSONNEL MANAGEMENT, et al.,  Defendants.	Case No. 3:25-cv-01780-WHA  STIPULATION AND PROPOSED ORDER RE: PLAINTIFFS' ADMINISTATIVE MOTION TO FILE UNDER SEAL	
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Stipulation and [Proposed] Order Granting Plaintiffs' Administrative Motion to File Under Seal No. 3:25-cv-01780-WHA

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Pursuant to Civil Local Rule 7-11, 7-12, and 79-5, the parties hereby stipulate and respectfully request that the Court grant Plaintiffs' Administrative Motion to File Under Seal and permit unredacted copies of the following documents to be filed under seal to protect the personal identifying information of the federal employees identified therein:

- 1. Exhibit 1 to the Supplemental Declaration of Amelia Glymph
- 2. Exhibit 1 to the Supplemental Declaration of Kory Blake
  Redacted copies of these documents will be filed on the public docket.

Stipulation and [Proposed] Order Granting Plaintiffs' Administrative Motion to File Under Seal No. 3:25-cv-01780-WHA

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2	DATED: April 11, 2025	
3	Respectfully Submitted,	
4	By: /s/ Danielle Leonard	
5		TRICK D. ROBBINS (CABN 152288)
6	Eileen B. Goldsmith (SBN 218029) PAN	ing United States Attorney MELA T. JOHANN (CABN 145558) ef, Civil Division
7	Robin S. Tholin (SBN 344845) KEI	LSEY J. HELLAND (CABN 298888) istant United States Attorney
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11	DIÂ	NE KELLEHER nch Director
12	CHI	RISTOPHER HALL istant Branch Director
13	JAN	MES D. TODD, JR. ior Trial Counsel
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28	Stipulation and [Proposed] Order Granting Plaintiffs' Administrative Motion to File Under Seal No. 3:25-cv-01780-WHA	

1	[PROPOSED] ORDER	
2	Pursuant to stipulation, IT IS SO ORDERED.	
3		
4	Dated:, 2025	
5	The Honorable William H. Alsup United States District Court Judge	
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28	Stipulation and [Proposed] Order Granting Plaintiffs' Administrative Motion to File Under Seal No. 3:25-cv-01780-WHA	